

REMARKS

Claims 1-16 remain pending in this application. Claims 1-16 are rejected. Claims 1-8 and 10-16 are amended herein to place the claims in better form with no change in scope. For example, in claim 11, the reference to "a fifth step of comparing" was changed to "another step of comparing" since there is no fourth step recited in claim 11.

Claims 1-2 and 9-10 have been rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,901,402 (Corston-Oliver et al.).

Claim 1 recites, and Corston-Oliver et al fails to disclose, a conversation database configured to store pieces of second morpheme information and a plurality of reply sentences which are associated with one another and a reply retrieval unit configured to retrieve, based on the piece of second morpheme information search at the topic search unit, a reply sentence associated with the piece of second morpheme information.

There are technical differences between the claimed invention and Corston-Oliver et al. The claimed invention focuses on a conversation control system which retrieves a reply sentence in response to input information received from a user. In contrast, Corston-Oliver et al. focuses on a system which compares input information received from a user with one or more documents and then identifies a document having a close relation to the input information.

Thus, while the claimed invention is directed to a conversation control system which retrieves, based on input from a user, a reply sentence to the input information, Corston-Oliver et al. is designed to retrieve documents as opposed to a reply sentence. Furthermore, Corston-Oliver et al. fails to disclose any morpheme extracting unit configured to extract at least one morpheme. Just because morphemes may be included in search terms does not mean that morphemes are being extracted.

Additionally, while in the claimed invention the conversation database is configured to store second morphine information and each piece of information that forms part of the second morpheme information has a morpheme, there is no indication that each piece of information in Corston-Oliver et al. has a morpheme. Additionally, Corston-Oliver et al. fails to disclose a retrieval of a reply sentence associated with a piece of second morpheme information. Corston-Oliver et al. compares the relationship between a first textual input and a second textual and does not disclose a reply sentence associated with the pieces of either the first textual input or second textual input. Accordingly, it is Applicants' position that claim 1 is patentable over Corston-Oliver et al.

In contrast to the recitation of claim 2, Corston-Oliver et al. fails to disclose that the pieces of the second morphine information are each associated with a plurality of reply sentences. In column 5, lines 38-50 of Corston-Oliver et al., a query is used to identify documents related to the query and an identification of the

documents or the documents themselves are provided. There is no indication of each piece of second morphine information being associated with a plurality of reply sentences. The cited portion of Corston-Oliver et al. is merely a comparison and retrieval operation. Column 9, lines 26-42 of Corston-Oliver et al. is directed to a parser and is not related to each piece of second morphine information being associated with a plurality of reply sentences. Additionally, Corston-Oliver et al., especially on column 9, lines 26-42, in contrast to the recitation of claim 2, fails to disclose reply sentences each being associated with types of responses. Also in contrast to the recitations of claim 2, Corston-Oliver et al. is directed to searching for information by comparison and there is no disclosure of a type of response since the output in Corston-Oliver et al. is the result of searching and no responses need to be chosen beyond the searching. Furthermore, in contrast to the recitation of claim 2, Corston-Oliver et al. does not compare the types of responses associated with a piece of second morphine information with the determined type of input since the type of input is not a factor utilized in the invention of Corston-Oliver et al. Furthermore, in contrast to the recitation of claim 2, in Corston-Oliver et al. no type of response is searched corresponding to the type of input and no retrieval of a reply sentence associated with the retrieved type of response is carried out. Thus, it is Applicants' position that claim 2 is patentable over Corston-Oliver et al.

Claim 9 recites, and Corston-Oliver et al fails to disclose, a conversation control method of comparing the first morpheme information with stored pieces of second morpheme information, searching for a piece of second morpheme information, and retrieving, based on the piece of second morpheme information, a reply sentence associated with the piece of second morpheme information.

Thus, while the claimed invention is directed to a conversation control method which retrieves, based on input from a user, a reply sentence to the input information, Corston-Oliver et al. is designed to retrieve files as opposed to a reply sentence. Furthermore, Corston-Oliver et al. fails to disclose any extracting of at least one morpheme. Just because morphemes may be included in search terms does not mean that morphemes are being extracted.

Additionally, there is no indication that each piece of information in Corston-Oliver et al. has a morpheme which is extracted. Also, Corston-Oliver et al. fails to disclose retrieving a reply sentence associated with a piece of second morpheme information. Corston-Oliver et al. compares the relationship between a first textual input and a second textual and does not disclose reply sentences associated with the pieces of either the first textual input or second textual input. Thus, it is Applicants' position that claim 9 is patentable over Corston-Oliver et al.

In contrast to the recitation of claim 10, Corston-Oliver et al. fails to disclose that the pieces of the second morphine information are each associated

with a plurality of reply sentences. In column 5, lines 38-50 of Corston-Oliver et al., a query is used to identify documents related to the query and an identification of the documents or the documents themselves are provided. There is no indication of each piece of second morphine information being associated with a plurality of reply sentences. The cited portion of Corston-Oliver et al. is merely a comparison and retrieval operation. Column 9, lines 26-42 of Corston-Oliver et al. is directed to a parser and is not related to each piece of second morphine information being associated with a plurality of reply sentences. Additionally, Corston-Oliver et al., especially on column 9, lines 26-42, in contrast to the recitation of claim 10, fails to disclose reply sentences each being associated with types of responses. Also in contrast to the recitations of claim 10, Corston-Oliver et al. is directed to searching for information by comparison and there is no disclosure of a type of response since the output in Corston-Oliver et al. is the result of searching and no responses need to be chosen beyond the searching. Furthermore, in contrast to the recitation of claim 10, Corston-Oliver et al. does not compare the types of responses associated with a piece of second morphine information with the determined type of input since the type of input is not a factor utilized in the invention of Corston-Oliver et al. Furthermore, in contrast to the recitation of claim 10, in Corston-Oliver et al. no type of response is searched corresponding to the type of input and no retrieval of a reply sentence associated

with the retrieved type of response is carried out. Thus, it is Applicants' position that claim 10 is patentable over Corston-Oliver et al.

Claims 3-8 and 11-16 have been rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,901,402 (Corston-Oliver et al.) in view of U.S. Patent No. 6,411,924 (de Hita et al.).

In contrast to claim 3, de Hita et al. fails to disclose or suggest a topic identification information search unit configured to compare the first morpheme information with pieces of topic identification information for identifying a topic and to search for the topic identification information corresponding to the morpheme constituting the first morpheme information. de Hita et al. teaches creating some kind of directory of topics but there is no comparison being done in de Hita et al. between the topics and any particular input or other information. de Hita et al. merely lists topics and those topics are not compared to some other input. In fact, the invention of de Hita et al. has no first morpheme information for the topics to be compared to.

Moreover, de Hita et al. fails to disclose or suggest the pieces of second morpheme information being associated with reply sentences since there is nothing to reply to and there are no reply sentences. De Hita et al. also fails to disclose or suggest the reply sentences being associated with types of response since there are no types of responses. Additionally, de Hita et al. has nothing to do with the types of responses being used to determine a proper response since de Hita et al.

is not directed to any type of response and no reply sentence is associated with the type of response.

Additionally, the combination of Corston-Oliver et al. and de Hita et al. is improper. The Office Action states that it would be obvious to modify Corston-Oliver et al. to include a topic identification information search unit as taught by de Hita et al. to enable a user to efficiently and intuitively select, filter, or browse through a group of selected documents based on their linguistic content. The purpose of Corston-Oliver et al. is to put in a search query and to obtain documents based on that search query. The invention of Corston-Oliver et al. already has a way to organize the documents presented to the user. If the system of topics taught by de Hita et al. were added to the invention of Corston-Oliver et al., then the organizational system of Corston-Oliver et al. would no longer work since the documents would be categorized by topics and not by the method of Corston-Oliver et al. Thus, such modification would make Corston-Oliver et al. inoperable for its intended purpose and the Federal Circuit has stated that there is no suggestion or motivation to make a proposed modification if the proposed modification would render the prior art being modified unsatisfactory for its intended purpose. *See In re Gordon*, 221 USPQ 1125, 1127 (Fed. Cir. 1984).

Furthermore, de Hita et al. states on page 2, lines 59-63 that "[a]ccordingly, what is needed is a system and method that comprehensively and automatically (i.e., without relying on keywords or other subject-matter indicators

inserted by authors) displays to a user. . ."(emphasis added). Thus, de Hita et al. specifically teaches against receiving an input from a user and instead provides all the options for the user to choose from. Thus, one of ordinary skill in the art would not modify Corston-Oliver et al. to have a listing of topics as taught in de Hita et al. since the invention of de Hita et al. includes a design for a list of topics that specifically avoids any kind of language input from a user. Thus, de Hita et al. and Corston-Oliver et al. teach the opposite and are not combinable. It is therefore Applicants' position that claim 3 is patentable over Corston-Oliver et al. in view of de Hita et al.

Claim 11 is patentable for similar reasons as claim 3.

Regarding claim 4, de Hita et al. fails to disclose or suggest a supplementation unit configured to add the piece of topic identification to the first morpheme information extracted at the morpheme extracting unit when no piece of second morpheme information corresponding to the extracted first morpheme information can be searched at the topic search unit. The "topic modified" disclosed in column 14 of de Hita et al. is merely a subtopic and it is not being supplemented based on what is being searched. It is therefore Applicants' position that claim 11 is patentable over Corston-Oliver et al. in view of de Hita et al.

Claim 12 is patentable for similar reasons as claim 4.

Regarding claim 5, de Hita et al. does not disclose or suggest pieces of second morpheme information each being associated with a plurality of reply

In light of the foregoing, the application is now believed to be in proper form for allowance of all claims and notice to that effect is earnestly solicited.

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sentences. There is no disclosure or suggestion in de Hita et al. of determining a rank, determining a priority level that corresponds to that rank, and to determine a reply sentence associated with an identified priority level. It is therefore Applicants' position that claim 5 is patentable over Corston-Oliver et al. in view of de Hita et al.

Claim 13 is patentable for similar reasons as claim 5.

Claims 6-8 and 14-16 are patentable at least for the reason that they depend from a patentable base claim. *See In re Fine*, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988).

Applicants respectfully request a two month extension of time for responding to the Office Action. **The fee of \$450.00 for the extension is provided for in the charge authorization presented in the PTO Form 2038, Credit Card Payment form, provided herewith.**

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